

Specialty Materials
Honeywell
P.O. Box 430
Highway 45 North
Metropolis, IL 62960
618 524-2111
618 524-6239 Fax

April 8, 2011

Mr. Greg Chomycia
Chemical Emergency and Preparedness
Prevention Section (SC-5J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Request for Information Pursuant to Section 114(a) of the Clean Air Act for
Honeywell Metropolis Works, Metropolis, Illinois

Dear Mr. Chomycia:

Enclosed are Honeywell Metropolis Works Facility's responses to the information requested by the U.S. Environmental Protection Agency by letter dated March 21, 2011, as well as the requested certification. Please note that Honeywell has stamped several of the documents as confidential. Please treat those documents and the information contained therein as confidential in accordance with 40 C.F.R. Part 2, Subpart B.

In addition, although Honeywell provided information regarding its former Liquid Fluorine process in this submission as requested, Honeywell has discontinued producing Liquid Fluorine. Accordingly, the maximum intended inventory for Liquid Fluorine in response to Request No. 3 is zero. Honeywell is in the process of updating its Risk Management Plan to reflect that the Metropolis Works Facility no longer produces Liquid Fluorine.

Should you have any questions about any of the responses, please do not hesitate to contact me.

Sincerely,



Mark A. Wolf
Nuclear Compliance Director

Specialty Materials

Honeywell

P.O. Box 430

Highway 45 North

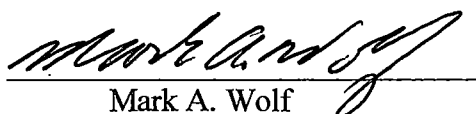
Metropolis, IL 62960

618 524-2111

618 524-6239 Fax

CERTIFICATION

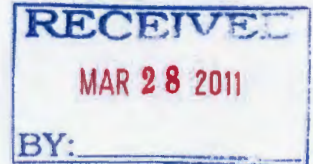
I, Mark A. Wolf, the Nuclear Compliance Director at the Honeywell Metropolis Works Facility, certify that other than with respect to the information regarding Liquid Fluorine which the Facility no longer produces, the information provided is true and complete to the best of my knowledge after due inquiry.


Mark A. Wolf

Dated: April 8, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590



MAR 21 2011

REPLY TO THE ATTENTION OF:

SC-6J

Larry Smith, Plant Manager
Honeywell Metropolis Works
2768 North US 45 Road
Metropolis, Illinois 55071

Re: Request for Information Pursuant to Section 114(a) of the Clean Air Act for Honeywell
Metropolis Works, Metropolis, Illinois

Dear Mr. Smith:

The U. S. Environmental Protection Agency requests that the Honeywell Metropolis Works submit the information specified in Appendix A pertaining to your facility located at 2768 North US 45 Road. The requested information must be sent to EPA **within 15 calendar days after you receive this request.**

Section 112(r) of the Clean Air Act (Act), 42 U.S.C. 7401 et. seq., addresses the accidental release of certain extremely hazardous substances. Section 112(r)(7) of the Act requires that owners or operators of stationary sources which have a regulated substance present in an amount greater than a threshold quantity, prepare and implement a Risk Management Program (Program). The purpose of the Program is to detect and prevent or minimize accidental releases of extremely hazardous substances, and to provide prompt emergency response to any such release in order to protect human health and the environment. Section 112(r)(7) of the Act also requires that owners or operators of such facilities prepare and submit to EPA a Risk Management Plan (RMP) which summarizes the critical elements of the Program. The regulations which describe the requirements of the Program and the RMP are known as the RMP Regulations and are at 40 C.F.R. Part 68.

EPA has the authority under Section 114 (a) of the Act, 42 U.S.C. § 7414 (a), to gather the information requested by this Information Request and to use the information in any subsequent enforcement action. Failure to comply with the terms of this Information Request, or to adequately justify a failure to respond, may be a violation of the Act which can result in an enforcement action brought by the EPA pursuant to Section 112 of the Act. This Information Request is not subject to the Approval requirement of the Paperwork Reduction Action of 1989, 44 U.S.C. § 3501 et seq., because it pertains to the investigation of a specific entity.

Honeywell Metropolis Works owns a facility in Metropolis, Illinois which has used or stored hydrogen fluoride, anhydrous ammonia and fluorine, which are chemicals regulated under

Section 112(r) of the Act. We are requesting this information to determine whether your facility is complying with the requirements of Section 112 (r) of the Act and the regulations implementing Section 112(r) at 40 C. F. R. Part 68. Section 112 (r) of the Act requires owners or operators of a stationary source at which a regulated substance is present in an amount greater than a threshold quantity to prepare and implement an RMP to detect and prevent or minimize accidental release of such substances.

You must send all required information to:

Mr. Greg Chomycia
Chemical Emergency and
Preparedness Prevention Section (SC- 5J)
U. S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

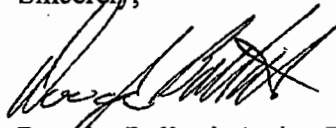
If you consider the information that you submit to us as confidential, you may assert a claim of business confidentiality for any portion of the submitted information under 40 C.F. R. Part 2, Subpart B (except emission data). Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B. Failure to assert a business confidentiality claim makes all submitted information available to the public without further notice.

You must submit all requested information under an authorized signature certifying that the information is true and complete to the best knowledge of the certifying official after due inquiry. Knowingly providing false information, in response to this request may be actionable under Section 113 (c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

Please give this matter your immediate attention. If you are unable to respond to this Information Request within the specified time, you may request additional time to submit the requested information by contacting Greg Chomycia at the following telephone number or email address: (312)353-8217; chomycia.greg@epa.gov. Further, please contact him if you have any questions or requests regarding this letter.

Thank you for your cooperation in this matter.

Sincerely,



Douglas Ballotti, Acting Director
Superfund Division

Enclosure Appendix A

APPENDIX A

The following information must be supplied by Honeywell Metropolis Works regarding the facility located in Metropolis, Illinois in accordance with the foregoing Request for Information pursuant to the Clean Air Act:

Re: Honeywell Metropolis Works
2768 N. U.S. 45 Road
Metropolis, IL 62960

In the Risk Management Plan (RMP) submitted June 10, 2010, Honeywell reported three processes: Anhydrous HF Equipment, NH₃ Unloading and Storage and Liquid Fluorine. This request for information pertains to these processes.

REQUEST FOR INFORMATION

1. Provide the name and address of the legal owner and/or operator of this facility. Provide the name of the parent corporation for this facility.
2. Submit a copy of the Management System developed to comply with 40 C.F.R. 68.15.
3. State the maximum intended inventory for Hydrogen Fluoride, Anhydrous Ammonia and Fluorine in every process.
4. Submit the most recent, complete Process Hazard Analysis performed in accordance with 40 C.F.R. 68.67 for the each of the Anhydrous HF Equipment, NH₃ Unloading and Storage and Liquid Fluorine processes.
5. Submit the documentation required by your facility's Management of Change procedures (40 C.F.R. 68.75) for the Anhydrous HF Equipment process.
6. Submit the documentation required by your facility's Management of Change procedures (40 C.F.R. 68.75) for the most recent change to Liquid Fluorine.
7. Submit a block flow diagram or simplified process flow diagram as required by 40 C.F.R. 68.65(c)(1)(i) for all three specified processes.
8. Submit documentation of the safety systems as documented to comply with 40 C.F.R. 68.65(d)(1)(viii) for all three specified processes.
9. Submit copies of invoices for all Hydrogen Fluoride purchases since January 1, 2006.

To:

Mr. Greg Chomycia
Chemical Emergency and
Preparedness Prevention Section (SC-5J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

From:

Mark Wolf
Honeywell
PO Box 430
Metropolis, IL 62960

**Section 1. Registration Information**

1.1 Source Identification	
1.1.a. Facility Name	HONEYWELL METROPOLIS WORKS
1.1.b. Parent Company #1 Name	HONEYWELL INTERNATIONAL, INC.
1.1.c. Parent Company #2 Name	
1.2 EPA Facility Identifier	100000053381
1.3 Other EPA Systems Facility Identifier	62960LLDSCUSH
1.4 Dun and Bradstreet Numbers (DUNS)	
1.4.a. Facility DUNS	6278170
1.4.b. Parent Company #1 DUNS	139691877
1.4.c. Parent Company #2 DUNS	
1.5 Facility Location	
1.5.a. Street - Line 1	2768 N. U.S. 45 ROAD
1.5.b. Street - Line 2	
1.5.c. City	METROPOLIS
1.5.d. State	IL
1.5.e. Zip Code - Zip +4 Code	62960-0430
1.5.f. County	MASSAC
1.5.g. Facility Latitude (in decimal degrees)	37.171278
1.5.h. Facility Longitude (in decimal degrees)	-088.756667
1.5.i. Method for determining Lat/Long	GPS Code Measurements (Psuedo Range) Standard Positioning Service Corrected using CACS
1.5.j. Description of location identified by Lat/Long	Center of Facility
1.5.k. Horizontal Accuracy Measure (meters)	7.5
1.5.l. Horizontal Reference Datum Code	World Geodetic System of 1984
1.5.m. Source Map Scale Number	
1.6 Owner or Operator	
1.6.a. Name	HONEYWELL INTERNATIONAL INC.
1.6.b. Phone	(973) 455-2000
1.6.c. Street - Line 1	101 COLUMBIA RD.
1.6.d. Street - Line 2	
1.6.e. City	MORRISTOWN
1.6.f. State	NJ
1.6.g. Zip Code - Zip +4 Code	07962
Foreign Country	
Foreign State/Province	
Foreign Zip/Postal Code	
1.7 Name, title and email address of person or position responsible for RMP (part 68) implementation	
1.7.a. Name of person	SCOTT JOHNSON
1.7.b. Title of person or position	HSE & REGULATORY AFFAIRS MANAGER
1.7.c. Email address of person or position	SCOTT.JOHNSON@HONEYWELL.COM

ANSO MAY 18 2009

**Section 1. Registration Information**

1.8 Emergency Contact	
1.8.a. Name	RICHARD THOMAS
1.8.b. Title of person or position	ENVIRONMENTAL SUPERVISOR
1.8.c. Phone	(618) 524-6244
1.8.d. 24-Hour Phone	(618) 524-6201
1.8.e. 24-Hour Phone Extension/PIN #	
1.8.f. Email address for emergency contact	RICHARD.THOMAS2@HONEYWELL.COM
1.9 Other Points of Contact	
1.9.a. Facility or Parent Company E-mail Address	
1.9.b. Facility Public Contact Phone Number	
1.9.c. Facility or Parent Company WWW Homepage Address	
1.10 Local Emergency Planning Committee (LEPC)	Massac County LEPC
1.11 Number of full-time equivalent (FTEs) employees of site	359
1.12 Covered by	
1.12.a. OSHA PSM	Y
1.12.b. EPCRA section 302	Y
1.12.c. CAA Title V Air Operating Permit Program	Y
1.12.d. Air Operating Permit ID #	127854AAD
1.13 OSHA Star or Merit Ranking	
1.14 Last Safety Inspection (by an External Agency) Date	05/08/2009
1.15 Last Safety Inspection Performed by an External Agency	NRC
1.16 Will this RMP involve Predictive Filing?	
1.18 RMP Preparer Information	
1.18.a. Name	RICHARD THOMAS
1.18.b. Phone	(618) 524-6244
1.18.c. Street - Line 1	2768 NORTH US 45
1.18.d. Street - Line 2	
1.18.e. City	METROPOLIS
1.18.f. State	IL
1.18.g. Zip	62960
Foreign Country	
Foreign State/Province	
Foreign Zip Code	

**Section 1. Registration Information****Section 1.17 Process Specific Information****Process 1**

Process ID #	1000002793		
Process Description	ANHYDROUS HF EQUIPMENT		
1.17.a. Program Level	3		
1.17.b. NAICS Code(s)	325188 (All Other Basic Inorganic Chemical Manufacturing)		
1.17.c. Chemical(s)			
	Chemical Name	CAS Number	Quantity
	Hydrogen fluoride/Hydrofluoric acid (conc 50% or greater) [Hydrofluoric acid]	7664-39-3	1124000

**Section 1. Registration Information****Section 1.17 Process Specific Information****Process 2**

Process ID #	1000002794		
Process Description	NH3 UNLOADING AND STORAGE		
1.17.a. Program Level	3		
1.17.b. NAICS Code(s)	325188 (All Other Basic Inorganic Chemical Manufacturing)		
1.17.c. Chemical(s)			
	Chemical Name	CAS Number	Quantity
	Ammonia (anhydrous)	7664-41-7	300000

**Section 1. Registration Information****Section 1.17 Process Specific Information****Process 3**

Process ID #	1000002795		
Process Description	LIQUID FLUORINE		
1.17.a. Program Level	3		
1.17.b. NAICS Code(s)	325188 (All Other Basic Inorganic Chemical Manufacturing)		
1.17.c. Chemical(s)			
	Chemical Name	CAS Number	Quantity
	Fluorine	7782-41-4	20000

**Section 2. Toxics: Worst Case****Scenario 1**

Process Name	ANHYDROUS HF EQUIPMENT
2.1 Chemical	
2.1.a. Name	Hydrogen fluoride/Hydrofluoric acid (conc 50% or greater) [Hydrofluoric acid]
2.1.b. Percent Weight of Chemical	100
2.2 Physical State	Gas liquified by pressure
2.3 Model Used	SAFER TRACE (with 25-mile limit)
2.4 Scenario	Liquid spill and vaporization
2.5 Quantity Released (lbs)	non-
2.6 Release Rate (lbs/min)	non-
2.7 Release Duration (mins)	10
2.8 Wind Speed (meters/sec)	1.5
2.9 Atmospheric stability class	F
2.10 Topography	Rural
2.11 Distance to endpoint (miles)	n
2.12 Estimated residential population within distance to endpoint (numbers)	non-
2.13 Public receptors within distance to endpoint	
2.13.a. Schools	n
2.13.b. Residences	n
2.13.c. Hospitals	n
2.13.d. Prison/Correctional Facilities	n
2.13.e. Recreational Areas	n
2.13.f. Major commercial, office or industrial areas	n
2.13.g. Other	
2.14 Environmental receptors within distance to endpoint	
2.14.a. National or State Parks, Forests or Monuments	Y
2.14.b. Officially Designated Wildlife Sanctuaries, Preserves or Refuges	Y
2.14.c. Federal Wilderness Area	
2.14.d. Other	
2.15 Passive mitigation considered	
2.15.a. Dikes	
2.15.b. Enclosures	
2.15.c. Berms	
2.15.d. Drains	
2.15.e. Sumps	
2.15.f. Other	
2.16 Graphics file	

**Section 3. Toxics: Alternative Release****Scenario 1**

Process Name	ANHYDROUS HF EQUIPMENT
3.1 Chemical	
3.1.a. Name	Hydrogen fluoride/Hydrofluoric acid (conc 50% or greater) [Hydrofluoric acid]
3.1.b. Percent Weight of Chemical	100
3.2 Physical State	Liquid
3.3 Model Used	SAFER TRACE
3.4 Scenario	Pipe leak
3.5 Quantity Released (lbs)	non-
3.6 Release Rate (lbs/min)	non
3.7 Release Duration (mins)	30
3.8 Wind Speed (meters/sec)	3
3.9 Atmospheric stability class	D
3.10 Topography	Rural
3.11 Distance to endpoint (miles)	non
3.12 Estimated residential population within distance to endpoint (numbers)	n
3.13 Public receptors within distance to endpoint	
3.13.a. Schools	
3.13.b. Residences	n
3.13.c. Hospitals	
3.13.d. Prison/Correctional Facilities	
3.13.e. Recreational Areas	
3.13.f. Major commercial, office or industrial areas	
3.13.g. Other	
3.14 Environmental receptors within distance to endpoint	
3.14.a. National or State Parks, Forests or Monuments	
3.14.b. Officially Designated Wildlife Sanctuaries, Preserves or Refuges	
3.14.c. Federal Wilderness Area	
3.14.d. Other	
3.15 Passive mitigation considered	
3.15.a. Dikes	
3.15.b. Enclosures	
3.15.c. Berms	
3.15.d. Drains	
3.15.e. Sumps	
3.15.f. Other	
3.16 Active mitigation considered	
3.16.a. Sprinkler systems	
3.16.b. Deluge systems	
3.16.c. Water curtain	
3.16.d. Neutralization	
3.16.e. Excess flow valve	

**Section 3. Toxics: Alternative Release**

3.16.f. Flares	
3.16.g. Scrubbers	Y
3.16.h. Emergency shutdown systems	Y
3.16.i. Other	WATER MITIGATION SPRAY TOWERS
3.17 Graphics file	

**Section 3. Toxics: Alternative Release****Scenario 2**

Process Name	NH3 UNLOADING AND STORAGE
3.1 Chemical	
3.1.a. Name	Ammonia (anhydrous)
3.1.b. Percent Weight of Chemical	100
3.2 Physical State	Gas liquified by pressure
3.3 Model Used	SAFER TRACE
3.4 Scenario	Transfer hose failure
3.5 Quantity Released (lbs)	non
3.6 Release Rate (lbs/min)	no
3.7 Release Duration (mins)	20
3.8 Wind Speed (meters/sec)	3
3.9 Atmospheric stability class	D
3.10 Topography	Rural
3.11 Distance to endpoint (miles)	non
3.12 Estimated residential population within distance to endpoint (numbers)	no
3.13 Public receptors within distance to endpoint	
3.13.a. Schools	
3.13.b. Residences	n
3.13.c. Hospitals	n
3.13.d. Prison/Correctional Facilities	
3.13.e. Recreational Areas	
3.13.f. Major commercial, office or industrial areas	
3.13.g. Other	
3.14 Environmental receptors within distance to endpoint	
3.14.a. National or State Parks, Forests or Monuments	
3.14.b. Officially Designated Wildlife Sanctuaries, Preserves or Refuges	
3.14.c. Federal Wilderness Area	
3.14.d. Other	
3.15 Passive mitigation considered	
3.15.a. Dikes	
3.15.b. Enclosures	
3.15.c. Berms	
3.15.d. Drains	
3.15.e. Sumps	
3.15.f. Other	
3.16 Active mitigation considered	
3.16.a. Sprinkler systems	
3.16.b. Deluge systems	
3.16.c. Water curtain	
3.16.d. Neutralization	
3.16.e. Excess flow valve	Y
3.16.f. Flares	

**Section 3. Toxics: Alternative Release**

3.16.g. Scrubbers	
3.16.h. Emergency shutdown systems	
3.16.i. Other	WATER MITIGATION SPRAY TOWERS
3.17 Graphics file	

**Section 3. Toxics: Alternative Release****Scenario 3**

Process Name	LIQUID FLUORINE
3.1 Chemical	
3.1.a. Name	Fluorine
3.1.b. Percent Weight of Chemical	100
3.2 Physical State	Liquid
3.3 Model Used	SAFER TRACE
3.4 Scenario	Pipe leak
3.5 Quantity Released (lbs)	n
3.6 Release Rate (lbs/min)	n
3.7 Release Duration (mins)	.1
3.8 Wind Speed (meters/sec)	3
3.9 Atmospheric stability class	D
3.10 Topography	Rural
3.11 Distance to endpoint (miles)	no
3.12 Estimated residential population within distance to endpoint (numbers)	no
3.13 Public receptors within distance to endpoint	
3.13.a. Schools	
3.13.b. Residences	n
3.13.c. Hospitals	n
3.13.d. Prison/Correctional Facilities	
3.13.e. Recreational Areas	
3.13.f. Major commercial, office or industrial areas	
3.13.g. Other	
3.14 Environmental receptors within distance to endpoint	
3.14.a. National or State Parks, Forests or Monuments	
3.14.b. Officially Designated Wildlife Sanctuaries, Preserves or Refuges	
3.14.c. Federal Wilderness Area	
3.14.d. Other	
3.15 Passive mitigation considered	
3.15.a. Dikes	
3.15.b. Enclosures	
3.15.c. Berms	
3.15.d. Drains	
3.15.e. Sumps	
3.15.f. Other	
3.16 Active mitigation considered	
3.16.a. Sprinkler systems	
3.16.b. Deluge systems	Y
3.16.c. Water curtain	
3.16.d. Neutralization	
3.16.e. Excess flow valve	
3.16.f. Flares	

**Section 3. Toxics: Alternative Release**

3.16.g. Scrubbers	Y
3.16.h. Emergency shutdown systems	Y
3.16.i. Other	
3.17 Graphics file	

**Section 6. Five-Year Accident History****Accident 1**

6.1 Date of accident		03/17/2007	
6.2 Time accident began		8:00 AM	
6.3 NAICS Code of process involved		325188 (All Other Basic Inorganic Chemical Manufacturing)	
6.4 Release duration		0 Hours 5 Mins	
6.5 Chemicals involved			
Chemical Name	CAS Number	Quantity released (lbs)	Percent weight of chemical
Hydrogen fluoride/Hydrofluoric acid (conc 50% or greater) [Hydrofluoric acid]	7664-39-3	1	100
6.6 Release Event			
6.6.a. Gas release	Y		
6.6.b. Liquid spills/evaporation	Y		
6.6.c. Fire			
6.6.d. Explosion			
6.6.e. Uncontrolled/Runaway reaction			
6.7 Release Source			
6.7.a. Storage vessel			
6.7.b. Piping	Y		
6.7.c. Process vessel			
6.7.d. Transfer hose			
6.7.e. Valve			
6.7.f. Pump			
6.7.g. Joint			
6.7.h. Other			
6.8 Weather conditions at time of event			
6.8.a. Wind speed and direction	meters/second		
6.8.b. Temperature (F)			
6.8.c. Atmospheric stability class			
6.8.d. Precipitation present			
6.8.e. Unknown weather conditions	Y		
6.9 On-site Impacts			
	Employees or contractors	Public responders	Public
6.9.a. Deaths	0	0	0
6.9.b. Injuries	1	0	0
6.9.c. Property damage (\$)	0		
6.10 Known off-site impacts			
6.10.a. Deaths	0		
6.10.b. Hospitalizations	0		
6.10.c. Other medical treatments	0		
6.10.d. Evacuated	0		
6.10.e. Sheltered-in-place	0		
6.10.f. Property damage (\$)	0		

**Section 6. Five-Year Accident History**

6.10.g. Environmental damage	
6.10.g.1. Fish or animal kills	
6.10.g.2. Tree, lawn, shrub or crop damage	
6.10.g.3. Water contamination	
6.10.g.4. Soil contamination	
6.10.g.5. Other	
6.11 Initiating event	Human error
6.12 Contributing factors	
6.12.a. Equipment failure	
6.12.b. Human error	
6.12.c. Improper procedures	
6.12.d. Overpressurization	
6.12.e. Upset condition	
6.12.f. By-pass condition	
6.12.g. Maintenance activity/inactivity	Y
6.12.h. Process design failure	
6.12.i. Unsuitable equipment	
6.12.j. Unusual weather conditions	
6.12.k. Management error	
6.12.l. Other	
6.13 Off-site responders notified	No, not notified
6.14 Changes introduced as a result of the accident	
6.14.a. Improved/upgraded equipment	
6.14.b. Revised maintenance	
6.14.c. Revised training	
6.14.d. Revised operating procedures	
6.14.e. New process controls	
6.14.f. New mitigation systems	
6.14.g. Revised emergency response plan	
6.14.h. Changed process	
6.14.i. Reduced inventory	
6.14.j. None	Y
6.14.k. Other	

**Section 7. Prevention Program: Program Level 3****Program 1**

Prevention Program Description	HF UNLOADING, STORAGE, PIPING, ETC.
7.1 NAICS Code for process	
7.1.a. Process Name	1000002793 (ANHYDROUS HF EQUIPMENT)
7.1.b. NAICS	325188 (All Other Basic Inorganic Chemical Manufacturing)
7.2 Chemicals	
Hydrogen fluoride/Hydrofluoric acid (conc 50% or greater) [Hydrofluoric acid]	
7.3 Date on which the safety information was last reviewed or revised	01/13/2009
7.4 Process Hazard Analysis (PHA)	
7.4.a. Date of last PHA or PHA update	09/08/2005
7.4.b. Technique used	
7.4.b.1. What if	Y
7.4.b.2. Checklist	
7.4.b.3. What if/Checklist Combined	Y
7.4.b.4. HAZOP	
7.4.b.5. Failure mode & effects analysis	
7.4.b.6. Fault tree analysis	
7.4.b.7. Other	
7.4.c. Expected or actual date of completion of all changes resulting from last PHA or PHA update	12/31/2010
7.4.d. Major hazards identified	
7.4.d.1. Toxic release	Y
7.4.d.2. Fire	Y
7.4.d.3. Explosion	Y
7.4.d.4. Runaway reaction	
7.4.d.5. Polymerization	
7.4.d.6. Overpressurization	Y
7.4.d.7. Corrosion	
7.4.d.8. Overfilling	
7.4.d.9. Contamination	
7.4.d.10. Equipment failure	Y
7.4.d.11. Loss of cooling, heating, electricity, instrument air	
7.4.d.12. Earthquake	
7.4.d.13. Floods	
7.4.d.14. Tornado	Y
7.4.d.15. Hurricanes	
7.4.d.16. Other	
7.4.e. Process controls in use	
7.4.e.1. Vents	
7.4.e.2. Relief valves	Y
7.4.e.3. Check valves	Y
7.4.e.4. Scrubbers	Y
7.4.e.5. Flares	
7.4.e.6. Manual shutoffs	Y

**Section 7. Prevention Program: Program Level 3**

7.4.e.7. Automatic shutoffs	Y
7.4.e.8. Interlocks	Y
7.4.e.9. Alarms and procedures	Y
7.4.e.10. Keyed bypass	
7.4.e.11. Emergency air supply	Y
7.4.e.12. Emergency power	Y
7.4.e.13. Backup pump	
7.4.e.14. Grounding equipment	Y
7.4.e.15. Inhibitor additions	
7.4.e.16. Rupture disks	Y
7.4.e.17. Excess flow device	
7.4.e.18. Quench system	
7.4.e.19. Purge system	
7.4.e.20. None	
7.4.e.21. Other	
7.4.f. Mitigation systems in use	
7.4.f.1. Sprinkler system	
7.4.f.2. Dikes	
7.4.f.3. Fire walls	
7.4.f.4. Blast walls	
7.4.f.5. Deluge system	Y
7.4.f.6. Water curtain	
7.4.f.7. Enclosure	
7.4.f.8. Neutralization	
7.4.f.9. None	
7.4.f.10. Other	WATER MITIGATION SPRAY TOWERS
7.4.g. Monitoring/detection systems in use	
7.4.g.1. Process area detectors	Y
7.4.g.2. Perimeter monitors	Y
7.4.g.3. None	
7.4.g.4. Other	
7.4.h. Changes since last PHA update	
7.4.h.1. Reduction in chemical inventory	
7.4.h.2. Increase in chemical inventory	
7.4.h.3. Change in process parameters	
7.4.h.4. Installation of process controls	Y
7.4.h.5. Installation of process detection systems	
7.4.h.6. Installation of perimeter monitoring systems	Y
7.4.h.7. Installation of mitigation systems	Y
7.4.h.8. None recommended	
7.4.h.9. None	
7.4.h.10. Other	
7.5 Date of most recent review or revision of operating procedures	01/13/2009
7.6 Training	

**Section 7. Prevention Program: Program Level 3**

7.6.a. Date of most recent review or revision of training programs	05/19/2005
7.6.b. Type of training provided	
7.6.b.1. Classroom	Y
7.6.b.2. On the job	Y
7.6.b.3. Other	
7.6.c. Type of competency testing used	
7.6.c.1. Written test	Y
7.6.c.2. Oral test	Y
7.6.c.3. Demonstration	
7.6.c.4. Observation	Y
7.6.c.5. Other	
7.7 Maintenance	
7.7.a. Date of most recent review or revision of maintenance procedures	05/14/2009
7.7.b. Date of most recent equipment inspection or test	08/06/2008
7.7.c. Equipment most recently inspected or tested (equipment list)	HF STORAGE TANK
7.8 Management of change	
7.8.a. Date of most recent changes that triggered management of change procedures	05/06/2009
7.8.b. Date of most recent review or revision of management of change procedures	01/11/2008
7.9 Date of most recent pre-startup review	05/18/2009
7.10 Compliance audits	
7.10.a. Date of most recent compliance audits	01/13/2009
7.10.b. Expected or actual date of completion of all changes resulting from the compliance audits	12/31/2013
7.11 Incident investigation	
7.11.a. Date of most recent incident investigation	02/23/2009
7.11.b. Expected or actual date of completion of all changes resulting from the incident investigation	06/30/2009
7.12 Date of most recent review or revision of employee participation plans	01/13/2009
7.13 Date of most recent review or revision of hot work permit procedures	02/23/2009
7.14 Date of most recent review or revision of contractor safety procedures	02/23/2009
7.15 Date of most recent evaluation of contractor safety performance	01/20/2009

**Section 7. Prevention Program: Program Level 3****Program 2**

Prevention Program Description	NH3 UNLOADING AND STORAGE
7.1 NAICS Code for process	
7.1.a. Process Name	1000002794 (NH3 UNLOADING AND STORAGE)
7.1.b. NAICS	325188 (All Other Basic Inorganic Chemical Manufacturing)
7.2 Chemicals	
Ammonia (anhydrous)	
7.3 Date on which the safety information was last reviewed or revised	01/13/2009
7.4 Process Hazard Analysis (PHA)	
7.4.a. Date of last PHA or PHA update	03/03/2009
7.4.b. Technique used	
7.4.b.1. What if	Y
7.4.b.2. Checklist	
7.4.b.3. What if/Checklist Combined	
7.4.b.4. HAZOP	
7.4.b.5. Failure mode & effects analysis	
7.4.b.6. Fault tree analysis	
7.4.b.7. Other	
7.4.c. Expected or actual date of completion of all changes resulting from last PHA or PHA update	12/31/2010
7.4.d. Major hazards identified	
7.4.d.1. Toxic release	Y
7.4.d.2. Fire	Y
7.4.d.3. Explosion	Y
7.4.d.4. Runaway reaction	
7.4.d.5. Polymerization	
7.4.d.6. Overpressurization	Y
7.4.d.7. Corrosion	
7.4.d.8. Overfilling	Y
7.4.d.9. Contamination	
7.4.d.10. Equipment failure	Y
7.4.d.11. Loss of cooling, heating, electricity, instrument air	
7.4.d.12. Earthquake	Y
7.4.d.13. Floods	
7.4.d.14. Tornado	
7.4.d.15. Hurricanes	
7.4.d.16. Other	
7.4.e. Process controls in use	
7.4.e.1. Vents	
7.4.e.2. Relief valves	Y
7.4.e.3. Check valves	
7.4.e.4. Scrubbers	
7.4.e.5. Flares	
7.4.e.6. Manual shutoffs	Y

**Section 7. Prevention Program: Program Level 3**

7.4.e.7. Automatic shutoffs	Y
7.4.e.8. Interlocks	
7.4.e.9. Alarms and procedures	Y
7.4.e.10. Keyed bypass	
7.4.e.11. Emergency air supply	Y
7.4.e.12. Emergency power	
7.4.e.13. Backup pump	
7.4.e.14. Grounding equipment	Y
7.4.e.15. Inhibitor additions	
7.4.e.16. Rupture disks	
7.4.e.17. Excess flow device	Y
7.4.e.18. Quench system	
7.4.e.19. Purge system	
7.4.e.20. None	
7.4.e.21. Other	
7.4.f. Mitigation systems in use	
7.4.f.1. Sprinkler system	
7.4.f.2. Dikes	
7.4.f.3. Fire walls	
7.4.f.4. Blast walls	
7.4.f.5. Deluge system	Y
7.4.f.6. Water curtain	
7.4.f.7. Enclosure	
7.4.f.8. Neutralization	
7.4.f.9. None	
7.4.f.10. Other	WATER MITIGATION SPRAY TOWERS
7.4.g. Monitoring/detection systems in use	
7.4.g.1. Process area detectors	
7.4.g.2. Perimeter monitors	
7.4.g.3. None	Y
7.4.g.4. Other	
7.4.h. Changes since last PHA update	
7.4.h.1. Reduction in chemical inventory	
7.4.h.2. Increase in chemical inventory	
7.4.h.3. Change in process parameters	
7.4.h.4. Installation of process controls	Y
7.4.h.5. Installation of process detection systems	
7.4.h.6. Installation of perimeter monitoring systems	
7.4.h.7. Installation of mitigation systems	Y
7.4.h.8. None recommended	
7.4.h.9. None	
7.4.h.10. Other	
7.5 Date of most recent review or revision of operating procedures	01/13/2009
7.6 Training	

**Section 7. Prevention Program: Program Level 3**

7.6.a. Date of most recent review or revision of training programs	05/19/2005
7.6.b. Type of training provided	
7.6.b.1. Classroom	Y
7.6.b.2. On the job	Y
7.6.b.3. Other	
7.6.c. Type of competency testing used	
7.6.c.1. Written test	Y
7.6.c.2. Oral test	Y
7.6.c.3. Demonstration	
7.6.c.4. Observation	Y
7.6.c.5. Other	
7.7 Maintenance	
7.7.a. Date of most recent review or revision of maintenance procedures	06/15/2005
7.7.b. Date of most recent equipment inspection or test	02/19/2009
7.7.c. Equipment most recently inspected or tested (equipment list)	#1 Ammonia Storage Tank
7.8 Management of change	
7.8.a. Date of most recent changes that triggered management of change procedures	05/15/2009
7.8.b. Date of most recent review or revision of management of change procedures	01/11/2008
7.9 Date of most recent pre-startup review	08/24/2007
7.10 Compliance audits	
7.10.a. Date of most recent compliance audits	01/13/2009
7.10.b. Expected or actual date of completion of all changes resulting from the compliance audits	12/31/2013
7.11 Incident investigation	
7.11.a. Date of most recent incident investigation	04/03/2008
7.11.b. Expected or actual date of completion of all changes resulting from the incident investigation	03/31/2009
7.12 Date of most recent review or revision of employee participation plans	01/13/2009
7.13 Date of most recent review or revision of hot work permit procedures	01/13/2009
7.14 Date of most recent review or revision of contractor safety procedures	01/13/2009
7.15 Date of most recent evaluation of contractor safety performance	01/20/2009

**Section 7. Prevention Program: Program Level 3****Program 3**

Prevention Program Description	LIQUID FLUORINE
7.1 NAICS Code for process	
7.1.a. Process Name	1000002795 (LIQUID FLUORINE)
7.1.b. NAICS	325188 (All Other Basic Inorganic Chemical Manufacturing)
7.2 Chemicals	
Fluorine	
7.3 Date on which the safety information was last reviewed or revised	08/29/2006
7.4 Process Hazard Analysis (PHA)	
7.4.a. Date of last PHA or PHA update	01/13/2009
7.4.b. Technique used	
7.4.b.1. What if	
7.4.b.2. Checklist	
7.4.b.3. What if/Checklist Combined	
7.4.b.4. HAZOP	Y
7.4.b.5. Failure mode & effects analysis	
7.4.b.6. Fault tree analysis	
7.4.b.7. Other	
7.4.c. Expected or actual date of completion of all changes resulting from last PHA or PHA update	01/29/2010
7.4.d. Major hazards identified	
7.4.d.1. Toxic release	Y
7.4.d.2. Fire	Y
7.4.d.3. Explosion	
7.4.d.4. Runaway reaction	
7.4.d.5. Polymerization	
7.4.d.6. Overpressurization	Y
7.4.d.7. Corrosion	Y
7.4.d.8. Overfilling	
7.4.d.9. Contamination	
7.4.d.10. Equipment failure	Y
7.4.d.11. Loss of cooling, heating, electricity, instrument air	Y
7.4.d.12. Earthquake	
7.4.d.13. Floods	
7.4.d.14. Tornado	Y
7.4.d.15. Hurricanes	
7.4.d.16. Other	
7.4.e. Process controls in use	
7.4.e.1. Vents	
7.4.e.2. Relief valves	Y
7.4.e.3. Check valves	
7.4.e.4. Scrubbers	Y
7.4.e.5. Flares	
7.4.e.6. Manual shutoffs	Y

**Section 7. Prevention Program: Program Level 3**

7.4.e.7. Automatic shutoffs	Y
7.4.e.8. Interlocks	Y
7.4.e.9. Alarms and procedures	Y
7.4.e.10. Keyed bypass	
7.4.e.11. Emergency air supply	
7.4.e.12. Emergency power	
7.4.e.13. Backup pump	
7.4.e.14. Grounding equipment	
7.4.e.15. Inhibitor additions	
7.4.e.16. Rupture disks	Y
7.4.e.17. Excess flow device	
7.4.e.18. Quench system	
7.4.e.19. Purge system	
7.4.e.20. None	
7.4.e.21. Other	
7.4.f. Mitigation systems in use	
7.4.f.1. Sprinkler system	
7.4.f.2. Dikes	
7.4.f.3. Fire walls	
7.4.f.4. Blast walls	
7.4.f.5. Deluge system	Y
7.4.f.6. Water curtain	
7.4.f.7. Enclosure	
7.4.f.8. Neutralization	
7.4.f.9. None	
7.4.f.10. Other	
7.4.g. Monitoring/detection systems in use	
7.4.g.1. Process area detectors	
7.4.g.2. Perimeter monitors	Y
7.4.g.3. None	
7.4.g.4. Other	
7.4.h. Changes since last PHA update	
7.4.h.1. Reduction in chemical inventory	
7.4.h.2. Increase in chemical inventory	
7.4.h.3. Change in process parameters	
7.4.h.4. Installation of process controls	Y
7.4.h.5. Installation of process detection systems	
7.4.h.6. Installation of perimeter monitoring systems	
7.4.h.7. Installation of mitigation systems	Y
7.4.h.8. None recommended	
7.4.h.9. None	
7.4.h.10. Other	
7.5 Date of most recent review or revision of operating procedures	01/13/2009
7.6 Training	

**Section 7. Prevention Program: Program Level 3**

7.6.a. Date of most recent review or revision of training programs	05/19/2005
7.6.b. Type of training provided	
7.6.b.1. Classroom	Y
7.6.b.2. On the job	Y
7.6.b.3. Other	
7.6.c. Type of competency testing used	
7.6.c.1. Written test	Y
7.6.c.2. Oral test	Y
7.6.c.3. Demonstration	
7.6.c.4. Observation	Y
7.6.c.5. Other	
7.7 Maintenance	
7.7.a. Date of most recent review or revision of maintenance procedures	06/27/2008
7.7.b. Date of most recent equipment inspection or test	03/25/2009
7.7.c. Equipment most recently inspected or tested (equipment list)	Liquid Fluorine Storage Tank
7.8 Management of change	
7.8.a. Date of most recent changes that triggered management of change procedures	04/09/2009
7.8.b. Date of most recent review or revision of management of change procedures	01/11/2008
7.9 Date of most recent pre-startup review	12/21/2008
7.10 Compliance audits	
7.10.a. Date of most recent compliance audits	01/13/2009
7.10.b. Expected or actual date of completion of all changes resulting from the compliance audits	
7.11 Incident investigation	
7.11.a. Date of most recent incident investigation	02/23/2009
7.11.b. Expected or actual date of completion of all changes resulting from the incident investigation	12/31/2009
7.12 Date of most recent review or revision of employee participation plans	01/13/2009
7.13 Date of most recent review or revision of hot work permit procedures	01/13/2009
7.14 Date of most recent review or revision of contractor safety procedures	01/13/2009
7.15 Date of most recent evaluation of contractor safety performance	01/20/2009

**Section 9. Emergency Response**

9.1 Written emergency response (ER) plan	
9.1.a. Is your facility included in the written community emergency response plan?	Y
9.1.b. Does your facility have its own written emergency response plan?	Y
9.2 Does your facility's ER plan include specific actions to be taken in response to accidental releases of regulated substances?	Y
9.3 Does your facility's ER plan include procedures for informing the public and local agencies responding to accidental releases?	Y
9.4 Does your facility's ER plan include information on emergency health care?	Y
9.5 Date of most recent review or update of your facility's ER plan	01/13/2009
9.6 Date of most recent ER training for your facility's employees	07/01/2008
9.7 Local agency with which your facility's ER plan or response activities are coordinated	
9.7.a. Name of agency	EMERGENCY SERVICES AND DISASTER
9.7.b. Phone number	(618) 524-2002
9.8 Subject to	
9.8.a. OSHA Regulations at 29 CFR 1910.38	Y
9.8.b. OSHA Regulations at 29 CFR 1910.120	Y
9.8.c. Clean Water Act Regulations at 40 CFR 112	Y
9.8.d. RCRA Regulations at 40 CFR 264, 265, 279.52	Y
9.8.e. OPA-90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, 30 CFR 254	Y
9.8.f. State EPCRA Rules of Laws	Y
9.8.g. Other	



Executive Summary

RMP*Submit Executive Summary
Honeywell Metropolis Works plant

About Honeywell

The Honeywell Metropolis Works is a manufacturing facility located in Metropolis, Illinois. It is part of the Specialty Materials business group of Honeywell International Inc.

Honeywell is a diversified technology and manufacturing leader, serving customers worldwide with aerospace products and services; control technologies for buildings, homes and industry; automotive products; turbochargers; and specialty materials. Headquartered in Morris Township, N.J., Honeywell's shares are traded on the New York, London, Chicago and Pacific Stock Exchanges.

Honeywell Specialty Materials, also based in Morris Township, N.J., is a Honeywell business group and a global leader in providing high-performance specialty materials such as fluorocarbons, specialty films, advanced fibers, customized research chemicals and intermediates.

Honeywell Specialty Materials Responsible Care® Commitment

The Honeywell Metropolis Works received RCS 14001 certification in May of 2009.

At Honeywell Specialty Materials, we are committed to the safety of our employees, the quality of our products, and being responsible stewards for the protection of our environment, the communities in which we operate, and our customers. We are a member company of the American Chemistry Council, and Responsible Care® is the foundation for sustainability in our business. Our Responsible Care® Management System is used to support our full commitment to comply with legal and other Health, Safety and Environmental (HS&E) requirements to which we subscribe and to drive continual improvement in these areas.

We achieve global operational excellence and reliability through the integration of Responsible Care® principles into the way we operate and work with our commercial partners – from our contractors and other suppliers to our customers. We conduct thorough product risk assessments prior to commercialization and we apply necessary resources and best practices in the development and handling of chemical products and materials. We promote process safety through our management systems for the design, construction, installation and maintenance of our facilities. We use quantitative and qualitative methodologies to evaluate enterprise risk and develop risk mitigation measures. As we strive toward environmental excellence and the prevention of pollution, we protect individual and public safety by manufacturing, transporting and storing our materials in a secure manner.

We invest in and improve the compliance processes for our products, processes and services using quantifiable goals to drive sustained safety and environmental excellence. We continue to see marked improvement in our safety and environmental performance and we will achieve and maintain HS&E third party certification at the business and operational levels of the organization wherever this commitment has been made.

As responsible corporate citizens, we continue to renew our commitment to the public through outreach activities, and by proactively communicating with our surrounding communities.

Honeywell Metropolis Works Facility

The Honeywell Metropolis Works Facility is an inorganic chemical manufacture facility that specializes in fluorinated specialty products. The chemical manufacturing facility has approximately 359 employees as of May 19, 2009. The plant's products are used to make nuclear energy, electrical systems components, and stain resistant textiles.

One of the materials used by the facility is Anhydrous Hydrogen Fluoride, which is on the RMP Rule's list of regulated substances. The Honeywell Metropolis Works plant's storage and use of Anhydrous Hydrogen Fluoride exceeds the specified threshold of 1000 lbs., as defined by the EPA's RMP Rule.

Anhydrous Ammonia, which is on the RMP Rules list of regulated substances, is also used at the facility. The Honeywell Metropolis Works facility's storage and use of Anhydrous Ammonia exceeds the specified threshold of 10,000 lbs., as defined by the EPA's RMP Rule.

Fluorine, which is on the RMP Rules list of regulated substances, is also used at the facility. The Honeywell Metropolis Works facility's storage and use of Fluorine exceeds the specified threshold of 1000 lbs., as defined by the EPA's RMP Rule.

In accordance with the requirements of the RMP Rule, a description of the following six elements is provided for the Honeywell Metropolis Works Facility:



Executive Summary

1) Accidental Release Prevention and Emergency Response Policies:

It is the policy of the Honeywell Metropolis Works to operate a safe and environmentally sound facility by identifying and controlling health, safety, and environmental risks related to its operations; by designing its processes to protect people, property and the environment; by conducting and continually reviewing and improving programs for safety, health and environmental excellence; and by establishing processes to assure that all laws and regulations applicable to its operations and products are known and observed. The accidental release prevention and emergency response policy associated specifically with the plant's use of Anhydrous Hydrogen Fluoride, Anhydrous Ammonia, and Fluorine involves the integration of safety devices and technologies inherent in the design of the process, safe operational procedures and management practices, operator training, the preparation and testing of site emergency response plans, the maintenance of onsite emergency response equipment and a professionally trained Emergency Response Team, coordinating our efforts and resources with local emergency response services, and communicating with the community.

2) Description of the Facility and the Regulated Substance Handled:

Honeywell Metropolis Works produces uranium hexafluoride, sulfur hexafluoride, iodine pentafluoride, antimony pentafluoride, and liquid fluorine. Liquid fluorine is produced for internal consumption only; all other chemicals produced are sold to offsite customers. The facility operates continuously to produce these chemicals. In the production process, we use the following chemicals that EPA has identified as having the potential to cause significant offsite consequences in the event of an accidental release.

- Anhydrous Hydrogen Fluoride

Anhydrous hydrogen fluoride is stored in the tank farm in three storage vessels. Additionally, a tank car may be on site for unloading purposes. Anhydrous hydrogen fluoride is used in the manufacture of fluorine and the conversion of uranium dioxide to uranium tetrafluoride.

- Anhydrous Ammonia

Anhydrous ammonia is stored in tank farm facilities in two storage vessels. Additionally, a tank car may be on site for unloading purposes. Ammonia is used for the production of hydrogen gas, which is consumed on site for the reduction of uranium ore concentrates to uranium dioxide.

- Liquid Fluorine

Liquid fluorine is produced on site and stored in four insulated storage vessels. The vessels are cooled with liquid nitrogen contained within the jacket that surrounds the vessel. Liquid fluorine is produced as needed and consumed in the manufacture of iodine pentafluoride, and antimony pentafluoride.

3) The General Accidental Release Prevention Program and Chemical-Specific Prevention Steps:

The general accident prevention for a Program 3 RMP facility is very comprehensive, consisting of twelve elements. These elements are part of Occupational Safety and Health Act - Process Safety Management Regulations (OSHA 1910.119). The general accident prevention elements are as follows.

- Process Safety Information
- Process Hazard Analysis
- Operating Procedures
- Training
- Mechanical Integrity
- Management of Change
- Pre-Startup Review
- Compliance Audits
- Incident Investigation
- Employee Participation
- Hot Work Permits
- Contractors

The Metropolis Works uses its Management of Change (MOC) process to assure plant compliance with many of the elements of OSHA 1910.119. Any plant process change requires the written approval of Safety, Occupational Health, Environmental, Production and Maintenance organizations including upper management. During the MOC review of a process change, actions required for compliance with regulatory requirements and plant policy are shown on the review form. These actions are completed before the change can be made.

A plant team consisting of both management and employees conducts in-depth incident investigations. The



Executive Summary

Life Critical permit program is also the responsibility of both management and employees. A trained in-plant auditor conducts compliance audits. Contractors receive extensive training concerning plant hazards and the plant rules and procedures that have been developed to ensure a safe workplace. Finally, mechanical integrity is assured by periodic inspections of critical equipment.

The chemical specific accident prevention/mitigation measures are shown below.

Anhydrous Hydrofluoric Acid

- Emergency storage tank and emergency air pollution prevention scrubber for relief valves on HF storage tanks.
- Automatic shut-offs on HF tank car-unloading valves.
- Nuclear level indicators on HF storage tanks to prevent accidental overfill.
- Improved valves in HF service.
- Risk assessment by outside consultant/expert.
- Foundation improvements to improve earthquake resistance for HF storage areas.
- Use of procedure check lists and improved training for operation of HF storage tanks.
- Fence line HF detectors and alarm.
- Periodic inspection of nitrogen pressure regulators and relief valves in HF system.
- Periodic inspection and/or replacement of unloading hoses.
- Monthly audit of unloading operations.
- Emergency repair kits for leaking tank cars.
- Pipeline color coding and marking.
- Motion detection kill switches for HF railcar unloading.
- Six water mitigation spray towers located at the tank farm and chemical unloading areas, plus water mitigation spray rings at each of the four plant HF vaporizer areas.
- Flow switch on scrubber (unloading) pump that activates automatic shut-off valves.
- Pressure switch on unloading line/hose activates automatic shut-off valves.
- Alarm on HF scrubber make-up water.
- Flow switch on HF dump tank emergency scrubber that activates a back-up water source.
- Administrative storage limits on storage vessels of approximately 80%.

Ammonia

- Excess flow valves on ammonia storage tanks and tank cars.
- Improved valves in ammonia service.
- Foundation improvements to improve earthquake resistance at ammonia storage tanks.
- Use of procedure check lists and improved training for Ammonia storage.
- Periodic inspection and/or replacement of unloading hoses.
- Monthly audit of unloading operations by area foreman.
- Pipeline color coding and marking.
- Six water mitigation spray towers located at the tank farm and chemical unloading areas useful to mitigate ammonia vapor releases.
- Iodine Pentafluoride/Antimony Pentafluoride
- Manually operated remote shutdown stations for IF5 process.
- HF detectors and automatic shutdown for IF5 area.
- Remotely operated shut-off valve for SbF5 packaging.
- New air pollution prevention scrubber to reduce both fugitive and release emissions.
- Instrumentation upgrades.
- Use of procedure check lists and improved training.

Liquid Fluorine

- Trailers placed on load cells to eliminate trailer movement and potential overfills.
- Instrumentation upgrades.
- Remote shut-off switches in the fluorine products area.
- Barrier posts placed around the tanks to prevent incidental collision.
- Use of check lists and improved training.

Gaseous Fluorine

- Air pollution prevention scrubbers for HF vaporizer relief valves.
- Air pollution prevention scrubber for cell maintenance booths to reduce fugitive emissions.
- High pressure alarms on HF vaporizers.
- Level control on fluorine cells (currently one operating line).
- Installation of new ventilation system to enhance air flow through plant.
- Use of check lists and improved training.
- Pressure switches on fluorine cells.
- High pressure shut-off on rectifiers.
- Water spray mitigation systems on critical equipment.



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Uranium Hexafluoride

- Smoke detectors and cameras in distillation areas for prompt emergency.
- Automatic shut-off valves at cylinder fill spots, remotely operated from control room
- Inventory reduction for distillation feed tanks.
- Cylinder buggies to reduce handling of hot UF₆ cylinders.
- Alternate tanks for containment of pressure relief.
- Automatic sampling system.
- Standby power system for critical equipment.
- General mechanical integrity program.
- Standard operating procedures to minimize emissions.
- Use of check lists and improved training.
- Enhanced procedures and checklists for UF₆ operations.
- Low boil condenser high pressure mitigation.
- Low boil condenser vacuum cleaning.
- New control valves in critical applications.

4) The Five Year Accident History:

There was one reportable (under RMP) incident within the last five years releasing either directly or indirectly chemicals regulated by the RMP program. This incident is briefly described below.

- On March 17, 2007 an employee received an injury as a result of maintenance on and subsequent leaking of a hydrogen fluoride line.

5) The Emergency Response Plan:

The Emergency Response Plan (ERP) describes measures developed and implemented at Honeywell Specialty Chemicals Metropolis Works for preventing, recognizing, and responding to emergency conditions that may arise at the plant. These measures have been developed to minimize hazards to human health or the environment from events that may arise during facility operations, including fires, explosions, or any unplanned sudden or non-sudden release of hazardous materials to air, soil, or surface water. The Metropolis Works' ERP has been developed to facilitate the rapid, orderly assembly of plant personnel and to activate trained Emergency Response personnel to assist in personnel rescue and controlling and containing an emergency condition on-site.

The provisions of the ERP and its supporting procedures have been developed to provide an appropriate means of detection and response for multiple industrial incidents and natural disasters, including those described in the Metropolis Works Risk Management Plan and the Honeywell Safety Demonstration Report for Renewal of Source Materials License SUB-526. This plan is intended to be fully consistent with the multiple regulatory requirements that apply to activities at the plant, including 10 CFR 40.31(j) and 29 CFR 1910.120(q). The Metropolis Works maintains a separate RCRA Contingency Plan that has been developed to implement the requirements of 40 CFR 264 and related regulations. The provisions of the RCRA Contingency Plan augment and complement the provisions of the ERP.

The ERP addresses the following subjects:

- ⌘ Pre-emergency planning and coordination with outside agencies
- ⌘ Personnel roles, lines of authority, training and communication
- ⌘ Emergency prevention, recognition, and classification
- ⌘ Safe distances and places of refuge
- ⌘ Site security and control
- ⌘ Evacuation routes and procedures
- ⌘ Decontamination
- ⌘ Emergency medical treatment and first aid
- ⌘ Emergency alerting and response procedures
- ⌘ Personal protective equipment and emergency equipment
- ⌘ Critique, debrief, and follow-up procedures

Notification of Public Officials

Upon declaration of an Alert or Site Area Emergency, the Incident Commander completes a checklist that establishes the pertinent information to be communicated to the local emergency services office.

The pertinent information includes the following:

- ⌘ Facility identification
- ⌘ Name of person reporting



Executive Summary

- ⌘ Classification of emergency
- ⌘ Description of event and facility conditions
- ⌘ Status and magnitude of any radioactive or hazardous material releases
- ⌘ Status and nature of any injuries
- ⌘ Recommended protective actions for employees and members of the public
- ⌘ Any offsite support requested

The required information is communicated to the local emergency services (911) and the ESDA Coordinator via phone by calling on a dedicated unlisted number or 911, or by a backup radio system. Follow-up communications are made to the Illinois Emergency Management Agency and to the NRC Operations Center. The notification to the NRCOC includes verification that the local and state officials have been notified of the event.

Some additional prevention/mitigation measures that have been taken in the last four years:

- Installed D/E Vaporizer Load Cells;
- Replaced perimeter release monitors;
- Purchased handheld radios;
- Restart Action List - Mech., Elec/Inst;
- Safe Haven Control Room;
- Install lighting, ground warning system;
- Start-up: Emergency Response Sirens;
- Security Capture Area Lighting;
- Smoke detectors and red lights in FMB;
- Security Central Alarm System;
- Flowmeters - GF2 H2 Scrubbers;
- Replace A & B Substation Feeders;
- Replace underground gas line;
- Firewall.

6) Planned Changes to Improve Safety:

Process Hazard Analyses (PHAs) of Honeywell Metropolis Works⌘ storage and processes using hydrogen fluoride, anhydrous ammonia, and fluorine are being updated according to a schedule, with the PHA for ammonia currently being conducted. The purpose of these systematic safety reviews is to confirm system documentation and identify opportunities to improve upon the existing safeguards of the covered equipment and to further reduce the potential for accidental release. The PHAs will be reviewed and revalidated at least every five years and improvements made as appropriate.